REMARKS

I. Introduction

In response to the Office Action dated March 9, 2006, claims 1, 2, 10, 11, 12, 20, 21, 22, and 30 have been amended. Claims 1-30 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Non-Art Rejections

In paragraphs (4)-(5) of the Office Action, claims 1-30 were rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter.

Applicants have amended the claims to overcome this rejection. Specifically, the methods are now computer implemented methods and various items are obtained as set forth in the claims. Accordingly, the claims are no longer directed to non-functional descriptive material.

In addition, MPEP 2106(IV)(B) provides:

> If the invention as set forth in the written description is statutory, but the claims define subject matter that is not, the deficiency can be corrected by an appropriate amendment of the claims. In such a case, Office personnel should reject the claims drawn to nonstatutory subject matter under 35 U.S.C. 101, but identify the features of the invention that would render the claimed subject matter statutory if recited in the claim.

Thus, Applicants respectfully request that the Examiner identify the features of the invention that would render the claimed subject matter statutory if recited in the claim.

III. Prior Art Rejections

In paragraphs (6)-(7) of the Office Action, claims 1-30 were rejected under 35 U.S.C. §102(e) as being anticipated by Ernst, U.S. Patent No. 6,591,278.

Specifically, claims 1, 11, and 21, were rejected as follows:

> As to claim 1, Ernst teaches "defining a project file comprising general information regarding the project" (column 5, lines 37-54);
>
> "defining a folder structure for the project wherein one or more project drawing files are organized into various folders by drawing file type" (column 15, lines 40-65);
>
> "and defining a companion file for each project drawing file, wherein each companion file comprises information to link each project drawing file to the project" (column 12, line 42 through column 13, line 34).

As to claims 11-20, these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-10 and are similarly rejected.

As to claims 21-30, these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-10 and are similarly rejected.

Applicant traverses the above rejections for one or more of the following reasons:

(1) Ernst neither teaches, discloses, or suggests a directory structure with drawing files organized into various folders by drawing file type;

(2) Ernst neither teaches, discloses, or suggests a companion file for each drawing file;

(3) Ernst neither teaches, discloses, or suggests a a companion file that provides information used to create a directory structure; and

(4) Ernst neither teaches, discloses, or suggests a companion file for each drawing file, wherein the companion file comprises information to link each drawing file to a particular project.

Independent claims 1, 11, and 21 are generally directed to defining a project in a computer graphics program. More specifically, a project file is obtained that provides general information regarding a project. A directory structure is then created for the project. Project drawing files are organized into various folders of the directory structure by drawing file type. Lastly, a companion file for each project drawing file is obtained. Each companion file provides information used to create the directory structure and also provides information to link each project drawing file to a particular project.

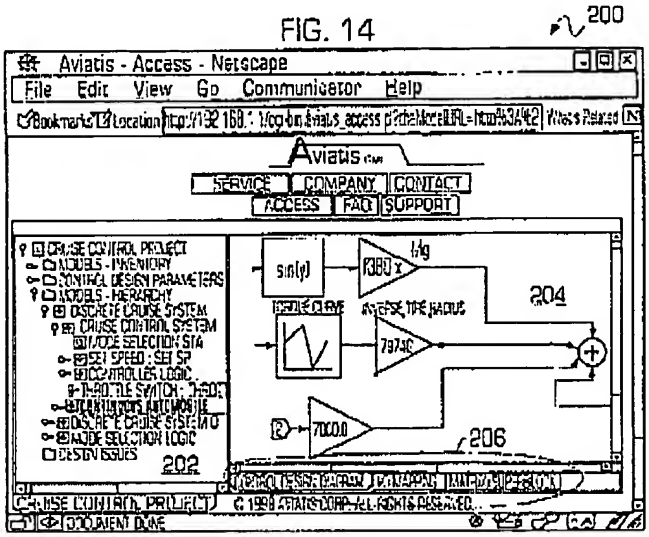
The cited reference does not teach nor suggest these various elements of Applicants' independent claims.

Ernst merely describes a project data management system and method. The project data management system and method are provided wherein any user associated with a project may access any of the information relevant to the project regardless of the location of each user or the information and regardless of what tool was used to create the information. The system also permits the user to interrelate information items from different locations or different tools. Each user may use a typical web browser application to access the information. The system may check and maintain the integrity of the information and/or alert each user when there is an inconsistency in any of the information associated with the project. The system makes the access, integration and monitoring of information between a distributed project team manageable and reduces the manual effort and time

spent accessing information, determining the relationship between different items of information, and avoiding inconsistencies between different pieces of information. (See Abstract).

In rejecting the folder structure of the invention, the office action relied on col. 15, lines 40-65 of Ernst. Col. 15, lines 40-65 describes FIG. 14 that provides a user interface of Ernst's invention.

FIG. 14



As can be seen (and described in the text), the section 202 is a meta-object hierarchy section that shows the outline of meta-objects in the model. When a user selects a meta-object in area 202, it is displayed in area 204. Further, tabs 206 may also be displayed that indicate other diagrams, dialogs, forms, or other user interface elements associated with the particular selected meta-object. According to Ernst, col. 4, lines 16-34, a project data management method stores master meta-objects relating to data associated with a project. Thus, a meta-object merely comprises data relating to a project. As set forth in FIG. 14, the meta-objects are set up hierarchically in area 202 and used to display the meta-object in area 204.

However, as claimed, a directory structure is used to store drawing files organized by drawing file type. In this regard, a drawing file and drawing file type is not equivalent to a meta-object. The various types of drawing files are further set forth in the dependent claims (i.e., claims 5, 15, and 25). In rejecting these dependent claims, the Office Action merely recites the same portion of Ernst and FIG. 14. However, as can clearly be seen, an elements folder, constructs folder, views folder, and sheets folder are not even remotely suggested in FIG. 14 or the supporting text. Further,

none of the figures illustrated describe or allude to drawing files. Instead, they are merely meta-objects and not files. As claimed, the project file is a file with general information about a project. Again, a file is not equivalent to a meta-object.

In addition, the current claims provide that a companion file is created for each drawing file and each companion file performs two functions. First, the companion file provides information used to create the directory structure. Secondly, the companion file comprises information to link each project drawing file to the project. In rejecting these claim elements, the Office Action merely relies on col. 12, line 42-column 13, line 34. This portion of text merely describes the use of master and slave meta-objects. Even assuming that the slave is considered the companion file to the master meta-object (which Applicants traverse), the slave meta-object is not used to provide information to create the directory structure (or the hierarchy of FIG. 14). In Ernst, the slave meta-objects have no location within FIG. 14. Instead, FIG. 14 merely shows meta-objects in a hierarchy and illustrates how to select and display a particular meta-object. However, the slave meta-object is not used to create a directory structure for organizing the master meta-objects. As claimed, the companion file provides information to create the directory structure that is used to organize the drawing files.

The claims also provide that the companion file comprises information to link each proejct drawing file to the project. For Ernst to teach such a limitation, the slave meta-object must provide information to link each master meta-object to the project. However, such a purpose and feature of the slave meta-object is not even remotely hinted at by Ernst. Instead, the cited portion of Ernst merely describes a meta-object model with the semantic containment relationship between different master and slave meta-objects. Such a teaching is not even remotely similar to the limitations set forth in the claims.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Ernst. In addition, Applicants' invention solves problems not recognized by Ernst.

Thus, Applicants submit that independent claims 1, 11, and 21 are allowable over Ernst. Further, dependent claims 2-10, 12-20, and 22-30 are submitted to be allowable over Ernst in the same manner, because they are dependent on independent claims 1, 11, and 21, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-10, 12-20, and 22-30 recite additional novel elements not shown by Ernst.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: June 9, 2006

By: _____
Name: Jason S. Feldmar
Reg. No.: 39,187

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